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June 23, 1992

Julie Erickson, Branch Chief
Environmental Restoration
USDOE Richland Operations Office
P.O. Box 550
Richland, WA 99352-0550

Dear Ms Erickson:

Re: 1992 Hanford Spring and Seep Sampling (M-30-02)

The purpose of this letter is to summarize the conference call held on June 22, 1992, to discuss existing Hanford Site seeps and springs data, and data collection in 1992. After much valuable and informative discussion, the participants reached two alternate resolutions. USDOE-RL reserved the right to further consider the alternatives, and to inform Ecology and EPA of its decision in a timely manner. The first alternative is to conduct spring and seep sampling in 1992; the second is to use groundwater quality data as surrogate data for the springs and seeps.

The authors of the Sampling and Analysis of 100-Area Springs (DOE/RL-92-12) recommended that springs and seeps be sampled in 1992, and that studies be conducted to correlate these discharges with groundwater conditions. This report (pg. 34) noted that additional data should be collected since previous studies by Dirkes (1990) and McCormack and Carlile (1984) acknowledged "the difficulties associated with relating spring discharge chemistry to river chemistry."

The Draft A, Columbia River Impact Evaluation Plan, however, does not specifically recommend conducting spring and seep sampling during 1992. We have been informed that the decision of whether to sample in 1992 can not wait for comment resolution of the Plan, because preparations for sampling in September must be begin in early July.

Our understanding of USDOE's most recent position is that existing sample results are adequate to determine impact. We disagree. As noted above, it is not a question of enough data, but that existing data does not allow accurate quantification of contaminant discharge to the River. Ecology believes that sampling is warranted in 1992 for several reasons, including:

- Past rounds of sampling were flawed to the point that we can not rely on the data in assessing the impact of discharges on health and the environment. River levels were too high, and pre-sampling activities (during Fall 1991) were improperly carried out, e.g., temperature measurements.



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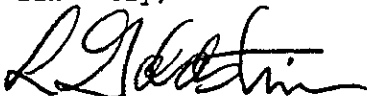
- ▶ This year promises to be fortuitous for sampling due to low water conditions.
- ▶ A Description Of Work for sampling needs to be developed by which all parties will be satisfied that their methodological concerns are satisfied.
- ▶ Ongoing sampling would be very useful for trend monitoring, and to establish baseline conditions relative to future characterization requirements under M-30, and to remedial action.

Ecology is willing to forgo sampling this Fall if maximum groundwater concentrations are used in the Impact Evaluation, and in future risk assessments as surrogate discharge concentrations. Reliance on groundwater values may require installation of new wells if existing well placement does not satisfy data quality objectives; and, it may entail modifying the sampling schedule of wells that are intended to correlate with spring and seeps. This alternative also would require further methodological discussion.

There is a short time in which to resolve this issue. If a decision whether to conduct sampling in 1992 is not reached in time to implement Fall sampling, then we have little choice but to use groundwater data to quantify seep and spring water quality values.

If you have any questions, please call me at (206) 438-7018.

Sincerely,



Larry Goldstein
CERCLA Unit Supervisor
Nuclear and Mixed Waste Management

LG:jr

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Subject: 1992 HANFORD SPRING AND SEEP SAMPLING (M-30-02)

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